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Lead Counsel for the Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

) Master File No. CV-07-5944 SC
)
) MDL No. 1917
)
) **DECLARATION OF LAUREN C.**
) **CAPURRO IN SUPPORT OF THE**
) **INDIRECT PURCHASER PLAINTIFFS'**
) **ADMINISTRATIVE MOTION TO FILE**
) **UNDER SEAL PURSUANT TO CIVIL**
) **LOCAL RULE 79-5(d)**

This document relates to:

ALL INDIRECT PURCHASER ACTIONS

DECLARATION OF LAUREN C. CAPURRO IN SUPPORT OF THE INDIRECT PURCHASER PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL LOCAL RULE 79.5(d)

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump & Prescott,
4 LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“Plaintiffs”) in the
5 above-captioned action. I make this declaration in support of the Indirect Purchaser Plaintiffs’
6 Administrative Motion to File Under Seal Pursuant to Civ. L. R. 79-5(d). Except where
7 otherwise stated, the matters set forth herein are within my personal knowledge and if called
8 upon and sworn as a witness I could competently testify regarding them.

9 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this
10 matter (Dkt. No. 306) (the “Protective Order”).

11 3. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), Plaintiffs
12 seek to file the following documents under seal:

13 • The highlighted portions of Indirect Purchaser Plaintiffs’ [Proposed] Surreply In
14 Opposition To Philips Taiwan Limited’s And Philips Do Brasil Ltda.’s Motion To
15 Dismiss For Insufficient Service Of Process And Lack Of Personal Jurisdiction
16 • The highlighted portions of the Second Declaration Of Lauren C. Capurro In
17 Opposition To Philips Taiwan Limited’s And Philips Do Brasil Ltda.’s Motion To
18 Dismiss For Insufficient Service Of Process And Lack Of Personal Jurisdiction

19 4. The documents or portions of the documents submitted under seal contain either
20 (a) material designated by Defendants pursuant to the Protective Order as “Confidential” or
21 “Highly Confidential” or (b) analysis of, references to, or information taken directly from
22 material designated by Defendants pursuant to the Protective Order as “Confidential” or “Highly
23 Confidential.”

24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct. Executed this 19th day of May, 2014 at San Francisco, California.

26 /s/ Lauren C. Capurro
27 Lauren C. Capurro